

Parties Listed on Signature Page

E-Filed: 10/31/08

IN THE UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA – SAN JOSE DIVISION

RAMBUS, INC.,

Plaintiff,

v.

HYNIX SEMICONDUCTOR INC., et al.,

Defendants.

Case No. C 05-00334 RMW

**STIPULATION AND
ORDER REGARDING OPPOSITION
TO RAMBUS'S DAUBERT MOTION
NO. 3 AND MOTION *IN LIMINE*
REGARDING W. CHRISTOPHER
BAKEWELL**

Honorable Ronald M. Whyte

RAMBUS, INC.,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD., et al.,

Defendants.

Case No. C 05-02298 RMW

**STIPULATION AND ORDER
REGARDING OPPOSITION TO RAMBUS'S
DAUBERT MOTION NO. 3**

CASE No. C 05 00334 RMW
CASE No. C 05 02298 RMW

1 WHEREAS, on October 24, 2008, Rambus Inc. ("Rambus") filed its *Daubert* Motion No.
 2 3 To Preclude The Manufacturers' Damages Experts From Relying On The Infineon Settlement
 3 Agreement, Certain Amended License Agreements, And Certain License Renegotiations; And
 4 Motion *In Limine* To Preclude W. Christopher Bakewell From Offering His Newly Formed
 5 Opinions At Trial (hereinafter "Rambus's *Daubert* Motion No. 3") in the above-captioned cases;

6 WHEREAS, Rambus and Samsung Electronics Co., Ltd., Samsung Electronics America,
 7 Inc., Samsung Semiconductor, Inc., and Samsung Austin Semiconductor, L.P. (collectively
 8 "Samsung") have reached an agreement, by and through their respective attorneys of record, that
 9 Samsung shall be permitted to file a separate opposition to Rambus's alternative Motion *In*
 10 *Limine* directed at Samsung's damages expert, W. Christopher Bakewell:

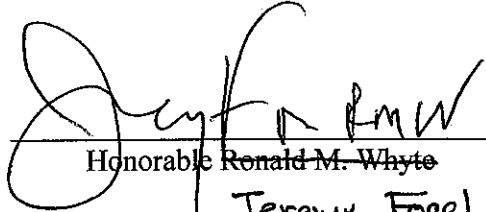
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 12 PURSUANT TO STIPULATION, IT IS ORDERED THAT:

13 Samsung is permitted to file a separate opposition to Rambus's *Daubert* Motion No. 3 to
 14 address Rambus's alternative Motion *in Limine* regarding W. Christopher Bakewell, to which
 15 Rambus may file a separate reply.

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 17 SO ORDERED.

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 19 Dated: 10/31, 2008

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 Honorable Ronald M. Whyte
 Jeremy Fogel

1 Dated: October 30, 2008

WEIL, GOTSHAL & MANGES LLP

2 By: /s/ Dana K. Powers
3 Dana K. Powers

4 Attorneys for Defendants
5 SAMSUNG ELECTRONICS CO., LTD.,
6 SAMSUNG ELECTRONICS AMERICA, INC.,
7 SAMSUNG SEMICONDUCTOR, INC., and
8 SAMSUNG AUSTIN SEMICONDUCTOR, L.P.

8 Dated: October 30, 2008

MUNGER TOLLES & OLSON LLP

9 SIDLEY AUSTIN LLP

10 McKOOL SMITH P.C.

11 By: /s/ Andrea W. Jeffries
12 Andrea W. Jeffries

13 Attorneys for RAMBUS INC.

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16 **Filer's Attestation:**

17 Pursuant to General Order No. 45, Section X(B) regarding signatures, I attest under
18 penalty of perjury that concurrence in the filing of this Stipulation has been obtained from Andrea
19 W. Jeffries.

20 Dated: October 30, 2008

WEIL, GOTSHAL & MANGES LLP

21
22 By: /s/ Dana K. Powers

23 DANA K. POWERS (Bar No. 252159)
24 Email: dana.powers@weil.com
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